

(PAGE 1)
10-30-06

IN THE UNITED STATES
DISTRICT COURT, MIDDLE
DISTRICT OF ALABAMA

RECEIVED

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DEBRA P. HACKETT, CLK
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA

FRANCIS TEJANI KUNDRA
#A20661647

CASE NUMBER

PETITIONER PLAINTIFF

V.

THE WARDEN
L.C.S. CORRECTIONS
SERVICES INC.
PERRY COUNTY CORRECTIONAL
CENTER.

2:06-CV-1001-MHT

SHARON HUDSON
U.S. CITIZENSHIP AND
IMMIGRATION SERVICES

ET AL

DEFENDANTS / RESPONDENTS

PLAINTIFFS ORIGINAL PETITION
OF SUIT OF DEFICIENCY OF AD-
MINISTRATIVE POLICY WHICH DE-
PRIVED ME OF MEDICAL TREAT-
MENT, MEDICATION AND PROTEC-
TION FROM INFECTIOUS DISEASES
WHICH CREATED DANGEROUS CONDITIONS

COMES NOW, FRANCIS
TEJANI KUNDRA (KUNDRA) (HEREAFTER
REFERRED TO AS PLAINTIFF) RESPE-
CTFULLY FILE THIS PETITION COM-
PLAINING OF LOUISIANA CORRE-
CTIONAL SERVICES (L.C.S.) INC,
PERRY COUNTY CORRECTIONAL
CENTER AND THE WARDEN

(PLEASE TURN OVER)

PAGE 2

AND THE WARDEN WAS ACTING
IN HIS SCOPE OF EMPLOYMENT
WITH DEFENDANT L.C.C.
AT PERRY COUNTY CORRECTIONAL
CENTER. PLAINTIFF FILE THIS
SUIT AGAINST DEFENDANT L.C.C.
FACILITY RUN AND OPERATED
BY (L.C.C.) AND SHARON HUD-
SON OF WHO'S AUTHORITY I
WAS PLACED IN THIS FACILITY
FOR CAUSE OF ACTION WILL
SHOW THE COURT AS FOLLOWS

PARTIES

PLAINTIFF FRANCIS TETANI KUNDRA
(KUNDRA) AN INDIVIDUAL CUR-
RENTLY DETAINED AT THE
CORRECTIONS CORPORATION OF
AMERICA (C.C.A) (HOUSTON PRO-
CESSING CENTER) FACILITY AT
15850 EXPORT PLAZA DR.
HOUSTON TX, 77032, HARRIS
COUNTY, TX. FOR IMMIGRATION
VIOLATION.

DEFENDANT L.C.S. CORRECTIONS
SERVICES INC. IS THE OWNER
AND OPERATOR OF THE DETENTION
FACILITY NAMED PERRY COUNTY
CORRECTIONAL CENTER WHERE
PLAINTIFF WAS PLACED AND
HOUSED WHEN THESE VIOLE-
TIONS OCCURRED.

THE DEFENDANT CAN
BE JAWED BY SERVING
(PLEASE TURN OVER)

PAGE 3

ITS REGISTERED AGENT:-
 THE WARDEN
 L.C.S. CORRECTIONS SERVICES
 INC.
 PERRY COUNTY CORRECTIONAL
 CENTRAL
 ROUTE 2 BOX 176
 HWY 80 WEST
 UNIONTOWN ALABAMA 36786
 TEL-(334) 628-8324

DEFENDANT U.S. IMMIGRATION
 AND CUSTOMS ENFORCEMENT
 OF WHO'S AUTHORITY IT
 WAS PLACED IN THIS
 FACILITY. CAN BE SERVED
 THROUGH:-

SHARON HUDSON
 DISTRICT DIRECTOR
 U.S. CITIZENSHIP AND IMMIGRATION
 SERVICES
 HOUSTON DISTRICT OFFICE
 126 NORTH POINT DR.
 HOUSTON TX. 77060

II JURISDICTION

BIVENS CLAIM:-

A BIVENS CLAIM IS AN IMPLIED
 ACTION AGAINST INDIVIDUAL FEDERAL
 OFFICIALS FOR VIOLATING
 THE PLAINTIFFS CONSTITUTIONAL
 RIGHTS. BIVENS V. SIX UNKNOWN
 NAMES FEDERAL BUREAU OF
 NARCOTICS, 403 U.S. 388 (1971).

(PLEASE TURN OVER)

(page 4)

BIVENS: CLAIMS MAY BE BROUGHT TO REDRESS FOURTH, FIFTH AND EIGHTH AMENDMENT VIOLATIONS
BIVENS IS AVAILABLE IF CONGRESS HAS NOT PROVIDED AN ALTERNATE LEGAL REMEDY AND IF NO SPECIAL FACTORS EXIST THAT WOULD COUNSEL AGAINST IMPLYING A REMEDY
PLAINTIFF CAN SEEK PUNITIVE DAMAGES AND CAN REQUEST A TRIAL BY JURY, NEITHER OF WHICH IS AVAILABLE IN AN FTCA CASE
A PLAINTIFF CAN FILE BOTH AN FTCA AND A BIVENS CLAIM IN THE SAME LAWSUIT. HOWEVER THE PLAINTIFF CANNOT RECEIVE A MONETARY JUDGMENT AGAINST THE UNITED STATES AND THE INDIVIDUAL OFFICIALS
THUS A PLAINTIFF WHO SUCCEEDS ON BOTH MUST ELECT BETWEEN THE TWO REMEDIES BEFORE THE ENTRY OF JUDGMENT

THE FTCA PROVIDES FOR A SPECIFIC WAIVER OF SOVEREIGN IMMUNITY FOR PERSONAL INJURY CAUSED BY THE NEGLIGENCE OR WRONGFUL ACT OF ANY EMPLOYEE OF THE GOVERNMENT WHILE WITHIN THE SCOPE OF HIS OFFICE OR EMPLOYMENT
THE GOVERNMENT MAY BE

(PLEASE TURN OVER)

PALMS

LIABLE FOR FAILING TO PREVENT
THE INTENTIONAL TORT OF A
NON-EMPLOYEE UNDER ITS
SUPERVISION. U.S. V. SHEARER
473 U.S. V. SHEARER 473
U.S. 52, 56 (1985).

THE UNITED STATES IS NOT
LIABLE FOR THE NEGLIGENCE
OF AN INDEPENDENT CONTRACT
OR OPERATING A DETENTION
FACILITY, BUT MAY BE LIABLE
FOR THE NEGLIGENT PLACE-
MENT OF AN INMATE AT THE
CONTRACT FACILITY. LOGUE
V. U.S. 412 U.S. 521, 530-33 (1973)
IN A BIVENS ACTION, THERE
IS NO REQUIREMENT TO FIRST
FILE AN ADMINISTRATIVE
COMPLAINT.

FOCUS

AM SUEING DEFENDANTS
THE WARDEN AND L.C.S. CORRE-
CTIONS SERVICE INC. IN THEIR
INDIVIDUAL AND OFFICIAL CAPACITIES
UNDER BIVENS BECAUSE THEY
ARE PRIVATE INDIVIDUAL AND NOT
FEDERAL EMPLOYEES: SEE MALE
SKO, 53 U.S. AT 65.

III

WHENEVER IT IS ALLEGED IN
THIS PETITION THAT DEFENDANT
L.C.S. CORRECTIONAL SERVICES
INC. DID OR FAILED TO DO
(PLEASE TURN OVER)

(P 215-6)

ANY ACT OR THING, IT IS MEANT THAT SUCH COMMISSION OR OMISSION WAS PERFORMED OR OMITTED BY AN AGENT, SERVANT OR EMPLOYEE OF SAID CORPORATION AND THAT IN EACH INSTANCE THE SAID AGENT, SERVANT OR EMPLOYEE WAS THEN ACTING FOR AND ON BEHALF OF SAID CORPORATION AND WITHIN THE SCOPE OF HIS OR HER EMPLOYMENT OR WITHIN THE AUTHORITY DELEGATE TO HIM OR HER BY SAID CORPORATION

IV

BACKGROUND FACTS

ON 08-05-06 I WAS AWAKENED UP FROM MY SLEEP AND TAKEN TO THE U.S. HOLD OVER CELL - I WAS VERY SURPRISED BECAUSE IT WAS ON A SATURDAY, AND SO IT WAS RIGHT THERE WHEN MY NAME WAS CALLED OUT, I WAS ASKED TO SIGN THIS NOTICE OF TRANSFER WHICH I REFUSED TO SIGN BECAUSE I DINT AGREE WITH IT.

THAT COME THAT NIGHT ON THE 9th OF AUGUST 2006 I WAS TAKEN WITH ABOUT 45 OTHER PRISONERS AND PROCESSED OUT FROM THIS C.C.A HOUSTON PROCESSING CENTER TO BE MOVED TO PENNY COUNTY CORRECTIONAL CENTER - ROUTE 2 BOX 176

(PLEASE TURN OVER)

(PAGE 8)

UNION TOWN, ALABAMA 36786
ON AUGUST 10th 2006 AT APPROXIMATELY 4:00 AM, THE BUS LEFT CARRYING US ON THAT LONG TRIP — WE ARRIVED AT PERAZ COUNTY JAIL IN UNION TOWN ALABAMA THAT EVENING ON THE SAME DAY.

AND SO WE WERE PROCESSED IN — BEFORE WE LEFT HOUSTON THE BUS DRIVER TOLD US TO PUT ALL OUR MEDICATIONS IN A BASKET WHICH HE HANDED OVER TO THE STAFF IN ALABAMA

WE WERE GIVEN UNIFORMS AND SOME OF OUR LEGAL PAPERS THAT WE HAD TO HAVE CARRIED WITH US. — WE FILLED OUT SOME PAPER WORK BUT NEVER DID WE ACTUALLY GET INTERVIEWED BY A MEDICAL STAFF OR EXAMINED BY A MEDICAL DOCTOR — THERE WAS NO SCREENING OF T.B. SUCH AS SKIN TEST OR TUBEX OR ANY OF THE CONTAGIOUS DISEASES

IN THIS FACILITY — THERE WAS A VERY STRICT POLICY OF RULES THAT THERE WAS NO MEDICATION UNDER ANY CIRCUMSTANCES TO BE TAKEN IN THE DORMS EVEN UNDER THE DOCTOR ORDER OF K.O.P. WHICH MEANS THAT A PRISONER

(PLEASE TURN OVER)

(PART 9)

CAN HAVE A BANDAGE OF HIS
PRESCRIBED MEDICATION TO BE
TAKEN AS INSTRUCTED BECAUSE
SOME WERE TOO FRILE OR
WEAK TO BE IN LINE OR WAIT
FOR NURSES TO GIVE THEIR
MEDICATIONS — NO, THEY RE-
FUSED TO RECOGNIZING THIS.
THIS CREATED REAL PROBLEMS
EVERY BODY ON MEDICATIONS !!
AND MANY WENT ~~WITHOUT~~ WITHOUT
GETTING THEIR PRESCRIBED MEDI-
CATIONS FOR DAYS BECAUSE
OF OUR CROWDED LINGS !! IT
WAS REDICULOUS.

TO MY "SURPRISE" I THOUGHT
MAY BE BECAUSE WE CAME FROM
THE HOUSTON CAMP WHERE WERE
UNDER THE CARE OF THE U.S.
PUBLIC HEALTH SERVICES THAT
WHY WE DINT GET AN INITIAL
MEDICAL EXAMINATION BUT ALL
INMATES THERE DINT GET ANY
INITIAL MEDICAL SCREENING
AS REQUIRED AND THERE WAS
A LOT OF PRISONERS NOT ONLY
I.N.S. DETAINEES BUT ALSO
REGULAR PRISONERS UNDER CRIM-
INAL SENTENCES AND MANY
STRAIT FROM THE STREETS.
WE WERE ALL LOCKED UP TOGET-
HER !! ~~THE~~ IN THE SAME
DORMS — THIS IS A SERIOUS
VIOLATION !!

NOW THERE WAS ONE
(PLEASE TURN OVER.)

(PAGE 10)

PRISONER WHO WAS SO SICK
HE WAS COUGHING OUT BLOOD!!
AND ANOTHER ONE ALSO.
ONE WAS TAKEN INTO THE
CLINIC SICK AREA FOR A COUPLE
OF DAYS AND LET BACK IN
THE POPULATION.

ONE MORNING I WAS
SHOCKED TO SEE THE MAJOR
AND A NURSE WITH MIZELS
COVERED THEIR MOUTHS AND
NOSSES AND TRYING TO GIVE
T.B. SKIN TESTS!! THIS WAS
TOO LATE BECAUSE THIS WAS
SUPPOSED TO BE DONE AT THE
VERY BEGINNING—NO, THOSE
SICK PRISONERS WERE WITH
US AND WE WERE EXPOSED
TO LIVE T.B.!!

WE HAD NO WHERE TO RUN
AND NO BODY WANTED TO HEAR
OUR COMPLAINT BECAUSE I
DID PROTEST AND COMPLAINT.
THE GUARDS YELLED AT
ME THAT "WE'LL PUT YOU
IN SEGRIGATION!!" SO I
BACKED OFF!!

TWO PRISONERS DIED!!
THANK BECAUSE OF THE POOR
MEDICATION AND TREATMENT
POLICY—I PUT IN SIX CALLS
ON MEDICAL REQUEST TO SEE
A DOCTOR—I NEVER SEEN OR
HVE BEEN EXAMINED BY A MEDI-
CAL DOCTOR!! ONE PRISONER

(PLEASE TURN OVER)

(PACB1)

DIED AFTER COMPLAINING OF PAIN AND NO BODY GIVE HIM ANY ATTENTION AND ANOTHER DIED OF COMPLAINING OF BACK PAIN VOMITTING AND PAIN.

NO BODY TRIED TO HELP TO PROTECT US — THERE WAS DELIBERATE INDIFFERENCE. THE QUESTION WE MUST ASK IS "DID THIS INSTITUTION FAIL TO DO SOMETHING THAT IS REQUIRED BY LAW?"

V.

CAUSE OF ACTION NO. 1

VICARIOUS LIABILITY AS TO DEFENDANT L.C.C.

PLAINTIFF CHARGE AND ALLEGES THAT DEFENDANT LCC IS VICARIOUSLY LIABLE FOR PLAINTIFF'S DAMAGES AS A RESULT OF THE BUSINESS RELATIONSHIP THAT EXISTED AT ALL TIMES MATERIAL TO THE PENDING LITIGATION BETWEEN L.C.C. AND DEFENDANTS, WARDEN AND EMPLOYEES WHOSE NEGLIGENCE OR OMISSION CAUSED OR PROXIMATELY CAUSED THE INJURIES TO THE PLAINTIFF.

PLAINTIFF ASSESS THE DOCTRINE OF RESPONDENT SUPERIOR AGAINST DEFENDANT L.C.C. AND RATIFICATION.

(P LOSS CAN OVER)

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OF THE CONDUCT OF DEFENDANT'S AGENTS WHO WERE ACTING WITHIN THE SCOPE OF THEIR EMPLOYMENT WITH DEFENDANT C.C.C.

VI

CAUSE OF ACTION NO. 2

NEGLIGENCE OF DEFENDANT WARDEN

PLAINTIFF CHARGES THAT INJURIES AND RESULTING DAMAGES TO PLAINTIFF WERE PROXIMATELY CAUSED BY THE NEGLIGENT ACTIVITY OF DEFENDANT WARDEN AND DEFENDANT'S AGENTS RATHER THAN A CONDITION CREATED DUE OVER SIGHT TO DO A PROCEDURE THAT IS REQUIRED BY LAW. PLAINTIFF ASSERTS THAT DEFENDANT WARDEN HAD A DUTY TO PROTECT PLAINTIFF FROM THE HARM POSED - HE IMPLEMENTED A VERY DEFICIENT POLICY.

PLAINTIFF WILL SHOW THAT HIS INJURIES AND DAMAGES WERE PROXIMATELY CAUSED BY THE FOLLOWING ACTS OR OMISSIONS OF NEGLIGENCE ON THE PART OF DEFENDANT WARDEN:

a) CREATING AN UNREASONABLY DANGEROUS CONDITION AND ALLOWING IT TO PERSIST WITHOUT TIMELY CORRECTION

b) ALLOWING AN UNREASONABLY (P LASE TURN OVER)

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- DANGEROUS CONDITION TO PERMIT WHEN HE KNEW OR HAD REASON TO KNOW THAT SUCH CONDITIONS WILL CAUSE HARM
- * C) WHY DID THEY HAVE A MEDICAL STAFF IN PLACE?
- D) FAILURE TO DO WHAT A REASONABLE PRUDENT NURSE WOULD HAVE DONE IN SOME OR SIMILAR CIRCUMSTANCES AND
- E) IGNORING PLAINTIFF COMPLAINTS.
- EACH OF THE FOREGOING ACTS OR OMISSIONS, SINGULARLY OR IN COMBINATION WITH OTHERS, CONSTITUTED NEGLIGENCE WHICH PROXIMATELY CAUSED THE OCCURRENCE MADE THE BASIS OF THIS LITIGATION AND PLAINTIFF RESULTANT INJURIES

VII

BY REASON OF THE INCIDENT AND EXPOSURE TO LIVE T.B. PLAINTIFFS SUBSEQUENT PERSONAL AND CONSEQUENTIAL DAMAGES, PLAINTIFF IS ENTITLED TO DAMAGES IN THE AMOUNT (\$5,000,000.00) FIVE MILLION DOLLARS, OR AS TO BE DETERMINED BY A JURY.

I WAS IN THIS INSTITUTION OF PEART COUNTY CORRECTIONAL (PLEASE TURN OVER)

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COUNTER FOR THE PERIOD FROM AUGUST 10th 06 - TO SEPTEMBER 2ND 06 AND SO THAT IS THE PERIOD OF EXPOSURE - UNTIL THE TIME OF TRIAL OF THIS CASE, THOSE BLAMANT OF DAMAGES FOR THE PURPOSE OF DETERMINING THE SUM OF MONEY THAT WILL FAIRLY AND REASONABLY COMPENSATE THE PLAINTIFF ARE:

- A) THE PHYSICAL PAIN THAT PLAINTIFF HAS SUFFERED
- B) THE MENTAL ANGUISH THAT PLAINTIFF HAS SUFFERED
- C) THE AMOUNT OF REASONABLE MEDICAL EXPENSES NECESSARILY INCURRED IN THE TREATMENT OF PLAINTIFF INJURED
- D) THE LOSS OF THE ENJOYMENT OF LIFE.

PRAYER FOR RELIEF

WHEREFORE, PLAINTIFF REQUESTS THAT CITATIONS BE ISSUED AND Served UPON DEFENDANTS TO APPEAR AND ANSWER THAT UPON FINAL TRIAL PLAINTIFF HAS JUDGMENT AS FOLLOWS:
 1) JUDGMENT AGAINST THE DEFENDANTS FOR COMPENSATORY DAMAGES.

(PLEASE TURN OVER)

EXHIBIT A.

(PAGE 1)

10-07-06

Francis Tejani Kundra
A2 0661647

C. C. A.

HOUSTON PROCESSING CENTER
15850 EXPORT PLAZA DR.
HOUSTON TX 77032THE WARDEN
L. C. S. CORRECTIONS SERVICES INC.
PEARLY COUNTY CORRECTIONAL CENTER
ROUTE 2 BOX 176
HWY 80 WEST
UNIONTOWN ALABAMA 36786

GREETINGS

NOTICE OF DEFICIENCY OF
ADMINISTRATIVE POLICY WHICH
DEPRIVED US OF MEDICAL TREATMENT,
MEDICATION AND PROTECTION FROM
INFECTIOUS DISEASES:

COMES NOW, Francis Tejani Kundra (Kundra) respectfully file and serve this notice of deficiency and intent to bring legal action against this institution and Sharon Hudson, District Director, U.S. Citizenship and Immigration Services under whose authority I have transferred over there.

(This notice will serve
(P cross turn over))

(PAGE 2)

THE REQUIREMENT BY LAW AND ITS VERY IMPORTANT FOR BOTH PARTIES TO RESPOND AND REPLY TO THE FOLLOWING ALLEGATIONS.

LET ME FIRST NOTE THIS: "THE UNITED STATES IS NOT LIABLE FOR THE NEGLIGENCE OF AN INDEPENDENT CONTRACTOR OPERATING A DETENTION FACILITY, BUT MAY BE LIABLE FOR THE NEGLIGENT PLACEMENT OF AN INMATE AT THE CONTRACT FACILITY." — LOGG V. U.S., 412 U.S. 521, 530-33 (1973).

IT WAS AFTER BEING NOTIFIED THAT ON AUGUST 10TH 2006, WE WERE PUT ON THE ICE BUS ABOUT 50 DETAINEES. WE WERE CARRIED ON THAT LONG TRIP, WE ARRIVED AT PHOENIX COUNTY CORRECTIONAL CENTRAL THAT EVENING ON THE SAME DAY, AT ARRAIVAL IN. S. CAPTAIN MASON SCARED THE HELL OUT OF US BY YELLING AT US "NO QUESTIONS".

WE WERE BROUGHT BACK TO HOUSTON ON SEPTEMBER 2ND 2006. THESE ALLEGATIONS HAPPENED DURING OUR STAY THERE —

I WAS VERY IMPRESSED WITH THIS BRAND NEW FACILITY — IT WAS NICE AND CLEAN UPON BEING ADMITTED AND (PLEASE TURN OVER)

(PAGE 3)

PROCESSED IN UNIFORMS ISSUED
E.T.C. THAN TAKEN TO THE
LAUNCH ROOM WHICH WAS
NICE AND THE FOOD WAS
GOOD AND CLEAN BUT THE
PORTIONS WERE LITTLE.
I WAS VERY SURPRISED
THAT THEY WERE OR RATHER
TO PUT IT EXACTLY - THERE WAS
NO MEDICAL SCREENING AT
ALL! OUR MEDICATIONS WERE
TAKEN AS WE HAD THEM ALL
PUT IN ONE BAG ON THE BUS
GIVEN TO THE FACILITY
CLINIC. IT WAS SUCH A HA-
RDICK TO GET ANY MEDICATION
BECAUSE OF THE LONG LINE
AT EVERY MEDICATION CLINIC.
THE STRICT RULES WERE
NO K.O.P. ALLOWED! THAT
IS NO MEDICATION UNDER ANY
CIRCUMSTANCES TO BE TAKEN
IN THE DREAMS - THIS CREATED
REAL PROBLEMS FOR EVERYBODY
AND MANY WENT WITHOUT GET-
TING THEIR PRESCRIBED MEDIC-
ATIONS. IT WAS RIDICULOUS!
TO MY SURPRISE I THOUGHT
MAY BE BECAUSE WE CAME FROM
THE HOUSTON CAMP WHERE WE
WERE UNDER THE U.S. PUBLIC HEALTH
SERVICES BUT ALL THE INMATES
THAT DINT GET ANY INITIAL
MEDICAL SCREENING AS
REQUIRED! AND THERE WAS
PLEASE EVEN OVER,

(PAGE 4)

A LOT OF PRISONERS NOT ONLY J.N.S. DETAINEES BUT ALSO REGULAR PRISONERS UNDER CRIMINAL SENTENCES AND MANY STRAIT FROM THE STREETS - WE WERE ALL LOCKED UP TOGETHER!! THIS IS A SERIOUS VIOLATION!!

NOW, THERE WAS ONE PRISONER WHO WAS SO SICK HE WAS COUGHING OUT BLOOD!! AND ANOTHER ONE ALSO, ONE WAS TAKEN INTO THE CLINIC SICK AREA FOR A COUPLE OF DAYS AND LET BACK IN THE POPULATION!!

ONE MORNING I WAS SHOCKED TO SEE THE MAJOR AND A NURSE WITH MIZU COVERED THEIR MOUTH AND NOSED AND TRYING TO GIVE T.B. TESTS ON SKIN. THIS WAS TOO LATE BECAUSE THIS WAS SUPPOSED TO BE DONE AT THE BEGINNING. NO THOSE SICK PRISONERS WERE WITH US AND WE WERE EXPOSED TO LIVE T.B.

WE HAD NO WAY TO RUN AND NO BODY WANTED TO HEAR OUR COMPLAINT BECAUSE I DID PROTEST AND COMPLAINT.

THE GUARDS YELLED AT ME THAT WE'LL PUT YOU IN SEPARATION!!
(P LADIE TURN OVER)

(PAGE 5)

SO I BACKED OFF!!
 TWO PRISONERS DIED!!
 THREE BECAUSE OF THE POOR
 MEDICATION AND TREATMENT
 POLICY - I PUT IN A SICK
 CALL ABOUT SIX TIMES
 TO SEE A DOCTOR - I NEVER
 SAW A DOCTOR!! ONE PRISONER
 DIED AFTER COMPLAINING
 OF PAIN AND NO BODY
 GAVE HIM ANY ATTENTION
 AND ANOTHER DIED OF COM-
 PLAINING OF BELLY PAIN
 VOMITTING AND
 NO BODY TRIED TO HELP
 THIS INSTITUTION FAILED
 TO PROTECT US - THERE WAS
 DELIBERATE INDIFFERENCE.
 THE QUESTION WE
 MUST ASK IS "DID THIS
 INSTITUTION FAIL TO DO
 SOMETHING THAT IS REQUIRED
 BY LAW?"

I WILL KEEP THIS INITIAL
 LETTER SHORT - PLEASE REPLY
 RESPECTFULLY SUBMITTED
 10-07-06 ~~Francis T. Jones~~ ~~Francis T. Jones~~

Francis T. Jones
 #A20661647

C.C. 1) SHARON HUDSON
 DISTRICT DIRECTOR
 U.S. CITIZENSHIP AND
 IMMIGRATION SERVICES
 HOUSTON DISTRICT OFFICE
 126 NORTH POINT DR.
 HOUSTON TX 77060

EXHIBIT BU.S. Immigration
and Customs
Enforcement

DETAINEE TRANSFER NOTIFICATION

This Form To Be Completed And Given To The Detainee

DETAINEE NAME: Kundra, Francis A# 20661647
NATIONALITY: UGANDATRANSFER INFORMATIONNAME OF NEW FACILITY: PERRY COUNTY CORRECTION CENTER
ADDRESS OF NEW FACILITY: ROUTE 2, BOX 176
HIGHWAY 80 WEST
UNION TOWN, ALABAMA 36786
TELEPHONE NUMBER OF NEW FACILITY: (334) 628-8324

I hereby acknowledge that I have received the transfer information. I have also been notified that it is my responsibility to notify family members or others, if I so desire.

Detainee Signature: (Refused to sign) A# 20661647 Date: 8/5/06Officer Signature: Glen R. Arnold, IEA Date: 9/5/06